

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	Case No. 3:22-cr-00327
v.)	
)	Judge Holmes
HEATHER IDONI)	

MOTION TO ADOPT CONDITIONS

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully requests the Court to adopt the conditions of release set by the Eastern District of Michigan.

On October 3, 2022, the Defendant was indicted by a grand jury for their role in conspiring to and executing a physical blockade of a reproductive health services provider in Mt. Juliet, Tennessee on March 5, 2021. Dkt. 3. The Indictment charged certain the defendant with one felony in violation of 18 U.S.C. § 241; and with one misdemeanor in violation of 18 U.S.C. § 248(a)(1). Dkt. 3.

The Defendant made an initial appearance in the Eastern District of Michigan before a United States Magistrate Judge. Dkt 32. The Judge imposed a series of conditions of release upon the defendant. Dkt. 32-5. On October 19, 2022, the Defendant filed a waiver of personal appearance at arraignment and entry of plea of not guilty. Dkt. 90. As a result, this Court did not have a hearing during which the conditions imposed by the Eastern District of Michigan were adopted. Therefore, the United States files the instant motion requesting that those conditions be adopted as written.

Defense Counsel has been consulted and has no objection to this motion.

Respectfully submitted,

MARK H. WILDASIN
United States Attorney
Middle District of Tennessee

s/ Amanda Klopff
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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2022, a true and exact copy of the foregoing document was delivered via the Court's electronic filing system to attorney for the defendant.

s/ Amanda Klopff
AMANDA KLOPF
Assistant United States Attorney